



Emporia Plywood  
634 Davis Street  
Emporia, VA 23847  
434-634-5123  
434-634-9193 fax

August 30, 2010

Certified Mail # 7010 1060 0002 1467 8878

Virginia Department of Environmental Quality  
Piedmont Regional Office, Air Quality Division  
4949-A Cox Road  
Glen Allen, VA 23060

RECEIVED

SEP 03 2010

3AP20

Re: Georgia-Pacific Wood Products LLC, Emporia Plywood Plant  
Title V Permit No. PRO50283  
Initial Notification Report  
National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion  
Engines (40 CFR Part 63 – Subpart ZZZZ)

Dear Sir/Madam:

In accordance with the requirements of 40 CFR 63.9(b) and 40 CFR 63.6645(a), attached is the Initial Notification Report Form for the Georgia-Pacific Wood Products LLC, Emporia Plywood Plant. The form indicates that one diesel-fired knuckle-boom log loader located at the facility may be subject to the referenced regulation.

Please note that we are submitting this notice in an abundance of caution in light of the imminent deadline, although we are not at all certain that the loader meets the definition of a “stationary” engine that would trigger applicability under the rule. In fact, we believe at present that the loader is *not* a stationary source and is instead a “nonroad internal combustion engine”, as it is on a piece of self-propelled equipment and also powers the equipment’s function of loading/unloading logs. Upon making a final determination, Georgia-Pacific will either rely on this notice as filed or, if we confirm that the equipment is not subject to the RICE rule, we will submit a request to you to rescind this notice.

If you should have any questions or desire additional information, please contact Brandon Grissom of myself at (434)634-5123.

**Certification:** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering and evaluating the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Joey Pate  
Plant Manager

Enclosure – Subpart ZZZZ Initial Notification Form

Cc: EPA Region III  
Diana Esher, APOO  
1650 Arch Street  
Philadelphia, PA 19103  
Certified Mail # 7010 1060 0002 1467 8861



INITIAL NOTIFICATION REPORT  
40 CFR Part 63 – Subpart ZZZZ  
National Emissions Standards for Hazardous Air Pollutants  
Stationary Reciprocating Internal Combustion Engines

SECTION I

GENERAL INFORMATION

This form is being submitted in accordance with 40 CFR §63.9(b) and as required by 40 CFR §63.6645(a).

Affected source submittal deadline: by **August 31, 2010**.

- A. Print or type the following information for the facility for which initial notification is being made: (§63.9(b)(2)(i)-(ii))

Operating Permit Number (IF AVAILABLE)		Facility I.D. Number (IF AVAILABLE)	
PRO50283			
Responsible Official's Name/Title			
Joey Pate			
Street Address			
634 Davis Street			
City	State	ZIP Code	
Emporia	VA	23847	
Facility Name			
Emporia Plywood Facility			
Facility Street Address (If different than Responsible Official's Street Address)			
Same			
Facility Local Contact Name		Title	Phone
Brandon Grissom		Environmental Coordinator	434-634-5123
City	State	ZIP Code	
Same			

- B. Check the box that applies. (§63.9(b)(2)(v))

- ☒ This facility is a major source of Hazardous Air Pollutants (HAP)
- ☐ This facility is an area source of HAP

*NOTE: A major source is a source that emits or has the potential to emit 10 tons per year, or more, of any one HAP or 25 tons per year, or more, of multiple HAP. All other sources are area sources. The major/area source determination is based on all HAP emission points inside the facility fence line, not just inside the facility itself.*

- C. Indicate the relevant standard or other requirement that is the basis for this notification and the source's compliance date: (§63.9(b)(2)(iii))

Basis for this notification (relevant standard or other requirement)	Anticipated Compliance Date (mm/dd/yy)
National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ). 40 CFR §63.6590 defines affected facilities.	May 3, 2013



## SECTION II

## SOURCE DESCRIPTION

- A. Briefly describe the nature, size, design, and method of operation of the source. (§63.9(b)(2)(iv))

The Emporia Plywood Plant produces finished pine plywood from pine logs (SIC 2436/NAICS 321212). The logs are cut to length, debarked, soaked in vats, and then peeled into veneer. After drying, resin is applied and the veneer is pressed into panels. The mill uses various reciprocating internal combustion engines to support the manufacturing process.

*NOTE: If the same information requested above is contained in a title V permit application or permit, you may attach the relevant pages from that document to this notification and reference those pages above.*

- B. Identify the types of engines within the affected source subject to the relevant standard and the types of hazardous air pollutants emitted. (§63.9(b)(2)(iv)). Indicate that the engine is stationary, when the engine was ordered and installed, the engine size (hp), fuel fired, and activity for which the engine is used to demonstrate that the engine is subject to initial notification requirements (e.g., stationary, 150 hp, diesel-fired engine ordered and installed in 1997 to drive log crane).

### Types of Emission Points

Unit Description: Self-propelled knuckle-boom log loader  
Unit Location: Log Vat System  
Unit Purpose: Used to process logs inside of the log vats  
Unit Model: Log Hog, Model 910  
Engine: Diesel-fired 4BTA Cummins 3.9L, 116 HP, 4-stroke lean burn;  
Fuel Type: Ultra low sulfur (15 ppm) No.2 diesel  
Install date: 1995  
Comment: Unit is permanently mounted to vat rail system and the engine performs both propulsion and log-loading functions along the length the vat rail system (~150 feet).

### Types of HAP Emitted

As tabulated in EPA's AP-42 *Compilation of Air Emission Factors* (5<sup>th</sup> Edition), Chapter 3.3, "Gasoline and Diesel Industrial Engines" and Chapter 3.4, "Large Stationary Diesel And All Stationary Dual-fuel Engines," emission factors for organic hazardous air pollutants from compression-ignition engines are available for acetaldehyde, acrolein, benzene, 1,3-butadiene, formaldehyde, naphthalene, toluene, xylenes, and polycyclic aromatic hydrocarbons, some of which are polycyclic organic matter.



INITIAL NOTIFICATION REPORT  
40 CFR Part 63 – Subpart ZZZZ  
National Emissions Standards for Hazardous Air Pollutants  
Stationary Reciprocating Internal Combustion Engines

**SECTION III**

**CERTIFICATION**

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained or referenced in this initial notification report are true, accurate, and complete.

Name of Responsible Official (Print or Type)	Title	Date (mm/dd/yy)
Joey Pate	Plant Manager	August 30, 2010

Signature of Responsible Official

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*Note: Responsible official is defined in 40 CFR §63.2, §70.2 and §71.2 and in EPA-approved State title V operating permits programs.*